



2025

SECOND HALF

SEMEN KRYVONOS NABU DIRECTOR

The past year was marked by difficult decisions and growing responsibility for Ukraine's anti-corruption system. It was not an easy year—neither in terms of the conditions we faced nor the high expectations that society rightly places on anti-corruption agencies. At the same time, the results achieved in previous years have set a high bar. This benchmark is both a major accomplishment and a constant challenge against which our work is measured today.



Operating in an environment where every step forward becomes increasingly difficult means not only maintaining performance but also proving our institutional capacity daily. The full-scale war, political shifts, and general institutional turbulence defined the landscape in which NABU operated. Under these conditions, one principle remains paramount: the Bureau acts strictly within the law, professionally and independently, never overstepping its mandate or responsibility.

This year was also a time for internal reflection and self-criticism. Recognizing the complexity of our tasks demands greater rigor toward ourselves, our processes, and the decisions we make every day. Not all results are immediately visible, but it is this consistent, methodical work that builds institutional resilience and allows us to move forward without illusions, but with a clear understanding of our role.

I am grateful to our colleagues at the Specialized Anti-Corruption Prosecutor's Office for their professional cooperation, endurance, and shared responsibility. Without this partnership, the effective functioning of the anti-corruption system would be impossible.

I extend my sincere gratitude to the NABU team for the professionalism and dedication shown throughout this year. The work of our detectives, analysts, and all supporting units often remains behind the scenes, yet it is their effort that defines our institution's true ability to fulfill its mission. Constant pressure and complexity were never used as excuses; on the contrary, they demanded even greater focus, internal discipline, and commitment to our principles.

Special thanks to civil society for your active stance, integrity, and readiness to publicly defend the independence of anti-corruption institutions. Your critical eye and demand for accountability are vital components of democratic oversight, ensuring the system never loses its bearings. This interaction is complex yet essential for institutional growth.

I also express my gratitude to our international partners for their steadfast support, trust, and principled position on preserving the independence of Ukraine's anti-corruption framework. This support carries both practical and symbolic weight, reaffirming that Ukraine's path toward reform and the rule of law remains our shared value.

This report is more than a summary of achievements; it is a snapshot of an institution being further tempered during a pivotal stage for Ukraine's anti-corruption system. NABU enters the next period with a clear-eyed understanding of the challenges ahead and our responsibility to the public, knowing that trust and results must be earned through our work every single day.

OLEKSANDR KLYMENKO

SAPO HEAD

The second half of 2025 became a period of serious stress-testing for the resilience of Ukraine's anti-corruption system and, at the same time, a confirmation of its ability to operate under increased pressure.



NABU and SAPO carried out their work in an environment of heightened political, informational, and institutional tension, which directly affected day-to-day operations and required maximum cohesion, professionalism, and commitment to principles from our teams. Despite these challenges, SAPO prosecutors, in cooperation with NABU detectives, continued their systematic efforts to combat high-level corruption.

In 2025, notices of suspicion were served on 218 individuals, and 124 indictments were submitted to court against 280 persons. The suspects include representatives of the highest levels of public authority, in particular in the energy and defense sectors, the judiciary, state-owned enterprises, and public administration bodies. These results reaffirm a fundamental principle: no position grants immunity from criminal liability.

Significant results were also achieved through the application of civil forfeiture mechanisms. In 2025, SAPO prosecutors filed 45 civil claims seeking the recovery of unjustified assets to the benefit of the state in the total amount exceeding UAH 260 million. This confirms the effectiveness of civil forfeiture as a key instrument for the recovery of unlawfully acquired assets.

The effectiveness of the anti-corruption system is further confirmed by judicial practice. In 2025, courts delivered 108 guilty verdicts, compared to 75 in 2024. This dynamic demonstrates not only the quality of pre-trial investigations and prosecutorial oversight, but also the system's ability to bring complex corruption cases to their logical conclusion and ensure accountability in line with the public demand for justice.

Since the beginning of the full scale invasion, more than UAH 3 billion was transferred to support the Defense Forces of Ukraine through the recovery of bail amounts, fines, and the application of other procedural mechanisms. In the context of the full-scale war, this underscores the direct link between the fight against corruption and the country's defense capability.

Strengthening SAPO's institutional capacity remained a priority in 2025 and was pursued through the launch of new competitive selection procedures and the adoption of SAPO's Development Strategy for 2026–2028.

At the same time, the second half of 2025 exposed systemic risks to the independence of the anti-corruption infrastructure. Decisions and initiatives that called into question the guarantees of independence of SAPO and NABU demonstrated that the achievements of the anti-corruption reform require constant protection and vigilance.

The teams of SAPO and NABU fully recognize the trust placed in them by Ukrainian society and international partners. We operate in an environment of turbulence, yet remain steadfast in our principles. The fight against high-level corruption is a daily effort upon which Ukraine's future and its European path depend.

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IN THE SECOND HALF OF 2025, NABU AND SAPO REACHED A NEW MILESTONE IN UNCOVERING CORRUPTION WITHIN STRATEGIC SECTORS OF THE ECONOMY AND DEFENSE

Despite ongoing russian aggression, anti-corruption agencies executed large-scale operations in the energy sector and exposed procurement schemes within the military. In this period alone, 12 top-ranking officials were notified of suspicion.

103

In total, 103 persons became suspects

A flagship case, Operation "Midas," dismantled a high-level criminal organization in the energy sector. The group implemented a "tollgate" scheme: contractors of the state-owned Energoatom were forced to pay kickbacks of up to 15% of contract values to secure payments for their services. **Just days prior, an official from an Energoatom branch was caught in the same scheme.** A series of exposures also took place in the defense sector. Officials of the State Service of Special Communications and Information Protection are suspected of embezzling over UAH 90 million allocated for the procurement of drones for the Defense Forces. **A former head of the Luhansk Regional Administration, an MP, and the head of a City Military Administration are suspected of multi-million UAV and electronic warfare procurement fraud.** A former head of a state enterprise misappropriated over UAH 102 million intended for the purchase of tank reactive armor, marking his fourth suspicion from NABU and SAPO. **Additionally, a brazen scheme involving high-ranking tax officials was uncovered;** they facilitated a money-laundering hub with a turnover of UAH 15 billion, leading to a UAH 147 million tax revenue shortfall. **More details on the high-profile cases of NABU and SAPO in the second half of 2025 can be found further in the report.**

126

A total of 126 defendants stood trial

A total of 126 defendants stood trial, **including the head of the Anti-Monopoly Committee of Ukraine,** who submitted a false asset declaration where the discrepancy between the declared property and available funds exceeded UAH 72 million. **The mayor of Mukachevo and the head of the District Council** are accused of selling land in the city center at significantly undervalued prices. **Nine individuals, including former officials of the State Land Cadastre,** are on trial for the illegal seizure of over 1,200 hectares of land in the Kyiv region. **The former head of the State Service of Special Communications and Information Protection and his deputy** will also face a verdict for embezzling UAH 62 million allocated for software procurement. **Furthermore, cases involving large-scale corruption at the Chernivtsi Customs and a former deputy minister of energy,** who sought a \$500,000 bribe, were sent to court.

50-70

Fifty convictions issued by the High Anti-Corruption Court against 70 individuals entered into force

The former head of the State Judicial Administration of Ukraine Oleksii Sal'nikov was sentenced to three years in prison after the HACC found him guilty of taking a bribe to influence Supreme Court rulings in favor of a commercial enterprise; the sentence was upheld on appeal and took effect. **The conviction of fugitive MP Andrii Odarchenko was also confirmed**, sentencing him to eight years in prison for bribing the head of the State Agency for Restoration and Infrastructure Development of Ukraine. **Valerii Kyrlov, Director of the "Pavlohrad Chemical Plant,"** was sentenced to four years of imprisonment for massive abuses in the sale of explosives. **Additionally, Serhii Hlivinskyi, a former SBU investigator from the Odesa region,** was imprisoned for nine years for extorting and receiving an \$80,000 bribe.

2

In the second half of 2025, two individuals were extradited to Ukraine from Germany

The first is a member of an organized group that, in conspiracy with **Energoatom officials**, embezzled nearly UAH 100 million intended for the construction of a nuclear fuel storage facility in the Chornobyl zone. **The second is a defendant accused of falsifying a land appraisal report**, understating its value, and causing UAH 81.7 million in damages to a local community in Zakarpattia.

UAH 4.7 BILLION

The total value of assets seized in NABU and SAPO cases sent to court during the reporting period exceeded UAH 4.7 billion

ECONOMIC IMPACT

2

UAH 4.9+ BILLION — THE ECONOMIC IMPACT OF NABU AND SAPO IN H2 2025

The economic impact of NABU and SAPO activities in the second half of 2025 reached a record high of nearly UAH 5 billion.

In the second half of 2025, over UAH 216 million was transferred to strengthen the country's defense capabilities. These funds include assets seized or paid under plea agreements within NABU and SAPO criminal proceedings, as well as bails transferred by HACC rulings. Since 2022, the total volume of assets transferred for military needs exceeds UAH 3 billion.

Additionally, thanks to preventive measures taken by NABU and a domestic manufacturer, UAH 3.24 billion was saved in the procurement of "deep strike" UAVs.

The total amount of restitution in cash and property within NABU and SAPO cases exceeded UAH 762 million. For the first time, a significant sum was successfully recovered from abroad—€3.37 million (equivalent to UAH 163.38 million). The payment was made by a French company involved in a corruption case concerning the State Enterprise "Polygraph Combine 'Ukraine'." Private companies Zaporizhzhiaoblenergo and Cherkasyoblenergo returned nearly UAH 129 million following 11 court rulings that invalidated debt assignment and transfer agreements initiated by National Bureau lawsuits. Under plea agreements, UAH 76 million was paid to Ukrzaliznytsia. As of December 31, 2025, a total of UAH 11.4 billion has been recovered for the state thanks to NABU and SAPO.

Fines imposed by the court on participants in NABU and SAPO criminal proceedings totaled over UAH 670 million. These include individuals involved in corruption at Ukrzaliznytsia and members of a criminal organization in Odesa.

Furthermore, several convictions involving the confiscation of assets worth over UAH 96 million have entered into legal force. This includes cash and other assets with a determined value.

RESTITUTION AND STRENGTHENING OF THE DEFENSE FORCES OF UKRAINE

REIMBURSEMENT IN NABU AND SAPO CASES

(ongoing and sent to court)

UAH **11.4** BILLION

as of 31.12.2025

UAH **762+** MILLION

in H2 2025

FUNDS SENT TO THE DEFENSE FORCES BY COURT ORDER

UAH **3+** BILLION

as of 31.12.2025

UAH **216+** MILLION

in H2 2025

Photo: "Come Back Alive" Charity Foundation



ECONOMIC IMPACT OF NABU AND SAPO WORK

(in H2 2025)

reimbursed to the state

UAH **762+** MILLION

million in fines collected for state revenue

UAH **672+** MILLION

in bail forfeited for state revenue

UAH **632+** THOUSAND

saved on UAV procurement for the Defense Forces

UAH **3.24+** BILLION

in cash/property confiscated by court order*

UAH **96+** MILLION

in bail, cash, property, and other assets sent to the Defense Forces by court

UAH **216+** MILLION

UAH

4.9+

BILLION

in H2 2025

* excluding confiscated assets with undetermined value

ECONOMIC IMPACT OF NABU AND SAPO WORK

(in 2025)

UAH **6.5** BILLION

HIGH-PROFILE CASES

2021 UAH **2.7** BILLION

2022 UAH **3.4** BILLION

2023 UAH **4.7** BILLION

2024 UAH **4.5** BILLION

2025 UAH **6.5** BILLION

*Total Economic Impact
for 2021-2025*

UAH
21.8+
BILLION

3



CORRUPTION IN THE ENERGY SECTOR

Operation "Midas" is one of the most high-profile investigations in recent years. Its uniqueness lies in the sheer scale and audacity of the suspects, who, despite lacking official authority, effectively controlled Energoatom—a strategic state enterprise with annual revenue exceeding UAH 200 billion.

The members of the scheme influenced everything from personnel decisions and procurement to financial flows. They sent a clear message to the company's suppliers: without a 10–15% kickback, payments under their contracts would be blocked. This practice became known as the "tollgate."

All of this was made possible through the criminal organization's connections within the Ministry of Energy and Energoatom. The operation was led by a well-known businessman, who involved a former advisor to the minister and Energoatom's executive director for physical protection and security.

According to the investigation, approximately \$100 million passed through this "laundry." The site was used not only for maintaining "shadow" accounting records but also for funneling cash through a network of foreign shell companies.

Operation "Midas" lasted over 15 months, beginning in the summer of 2024. During this period, an enormous volume of information was gathered, including thousands of hours of audio recordings. The final phase involved nearly all NABU detectives, who conducted over 70 searches in Kyiv and various regions, seizing a significant amount of documentation and cash.

Another exposure highlights the prevalence of the "tollgate" practice. A deputy director general of an Energoatom branch also demanded kickbacks in exchange for timely payments for services rendered. The bribe amount remained the same—10–15% of the contract value.

CORRUPTION IN THE DEFENSE SECTOR

Investigating corruption in the defense sector remains a strategic priority for NABU and SAPO. At a time when every hryvnia must serve the front lines, the embezzlement of budget funds earmarked for weaponry or equipment is not merely an economic crime; it is an undermining of national security.

In the second half of 2025, detectives and prosecutors uncovered a fraudulent scheme involving the procurement of drones for the Defense Forces. In 2023, the State Service of Special Communications and Information Protection received UAH 30 billion from the state budget for this purpose. However, officials saw this not as an opportunity to strengthen the military, but as a resource for self-enrichment. According to the investigation, the head of one of the service's departments developed a scheme in which drones were purchased at prices 70–90% above market rates. The perpetrators planned every detail meticulously. To ensure "preferred" companies won the tenders, they involved controlled firms to create an illusion of competition. To justify the astronomical prices, they conducted manipulative marketing research. As a result, the state lost over UAH 90 million on the procurement of 400 DJI Mavic 3 and 1,300 Autel Evo Max 4T drones. These funds were funneled to the accounts of controlled companies, including those abroad. However, anti-corruption authorities acted preemptively, seizing over \$4 million in foreign accounts and UAH 17 million within Ukraine.

Another scheme uncovered by NABU and SAPO during the reporting period concerns the procurement of UAVs and electronic warfare (EW) equipment in 2024–2025. This time, the target was community funds that local self-government bodies had transferred for military needs. An organized criminal group, led by a former head of the Luhansk Regional State Administration and a Member of Parliament, effectively imposed a "tax" on the purchase of EW systems. For signing contracts at clearly inflated prices, its members received bribes amounting to up to 30% of the contract value.



Using a similar method, FPV drones were purchased for nearly UAH 10 million. The manufacturer inflated the product cost by \$80,000, and members of the criminal group received their kickback for approving the procurement. A separate episode of this case, involving a UAV manufacturer, concerns the trade of draft deferments (military "reservations") through fictitious employment. The company's executives are essentially suspected of obstructing the lawful activities of the Armed Forces of Ukraine.

Equally significant is the case involving the embezzlement of UAH 102 million intended for reactive armor for the Armed Forces' armored vehicles. This occurred in April 2022, while the enemy was attempting to break through the front lines. Nevertheless, the then-director general of a state-owned enterprise decided to seize the moment. Together with accomplices, he entered into an agreement where components were purchased through fictitious shell companies at nearly triple the market price. Consequently, budget losses exceeded UAH 102 million. **Thanks to the efforts of NABU, SAPO, and the SBU, alongside audits by the State Audit Service and the State Financial Monitoring Service,** the money laundering chain was exposed. The former officials who profited at the expense of tank crew safety will now face justice.

CORRUPTION DURING WARTIME

Corruption during wartime causes exceptional harm. It diverts resources that could have saved lives. This is a deliberate enrichment at the expense of others' misfortune—essentially, an act of looting.

A prime example is the embezzlement of UAH 140 million intended for heating and water supplies in frontline cities in the Donetsk region. The scheme, uncovered by NABU and SAPO in November, was organized by the head of the Housing and Utilities Department of the Donetsk Regional Administration. His accomplices operated using a familiar method: they conducted direct procurements from pre-selected fictitious enterprises, artificially inflated the price of equipment, and delivered seven modular boiler houses—valued at over UAH 200 million—to Selydove and Ukrainsk without any documentation. As a result, only two were ever connected, and even those proved to be defective.

A similar situation unfolded in Sviatohirsk, where payments were made for work performed without permits or designs, and in gross violation of safety standards. The crudely built facilities failed to function as intended, while the perpetrators pressured heads of communal enterprises to accept them onto their balance sheets. Through this scheme, the state lost over UAH 140 million, leaving residents without water or heat.

Such schemes also exist far from the front lines—in Kyiv. While the country focuses on how to support its defenders, certain Ministry of Defense officials found ways to profit from the construction of housing for military personnel. For instance, one of the suspects promised a developer a win in a tender, valuing his "services" at \$1.3 million. The bribe was intended to be paid in installments via bank safe-deposit boxes. However, the scheme was halted in time: in August 2025, NABU and SAPO exposed the accomplices immediately after the first installment was received.



CORRUPTION IN THE VERKHOVNA RADA

NABU and SAPO uncovered a series of corruption schemes involving sitting Members of Parliament. The investigations involve bribery for votes, manipulation of NSDC sanctions, and money laundering.

The most high-profile case involved a scheme to bribe MPs to secure "required" votes. The criminal group had a hierarchical structure and a clear division of roles, with the operations coordinated by one of the parliamentarians. Before voting, instructions containing specific bill numbers were sent via a dedicated WhatsApp group. Following the votes, specific MPs systematically received cash rewards. These amounts increased over time: while the rate was \$2,000 in the fall of 2022, by August 2025, the minimum reward had risen to \$5,000. In December, NABU and SAPO notified five lawmakers of suspicion in this case.

Another case involves the exposure of a criminal group led by a female Member of Parliament. Its members offered a businessman to arrange for the National Security and Defense Council (NSDC) of Ukraine to impose sanctions on a competitor's company in exchange for \$250,000.

The perpetrators claimed they could funnel these funds to government officials, including NSDC members, to secure the sanctions. As a safeguard to guarantee the full bribe, they instructed the company representative to sign a promissory note disguised as a personal loan. After receiving an initial \$125,000, the "client" was told the money would be passed to NSDC officials. However, the funds were never transferred to any officials, as the perpetrators failed to find anyone willing to carry out the illegal act.

Another lawmaker misappropriated funds from a private company by promising to assist its representatives in obtaining a permit for the cross-border transport of mineral fertilizers. After the funds were transferred to the account of a close associate, the suspect took no action in the company's interest. To launder the illicit proceeds, the MP devised a scheme: over UAH 9 million was first transferred to a relative's law firm under the guise of "legal services." A portion of these funds was then used to purchase two luxury vehicles: a BMW X5 M and a Mercedes-Benz G 63 AMG. The MP began openly driving these vehicles, pretending they were purchased with legitimate business income. **A suspicion from NABU and SAPO followed shortly thereafter.** The investigation is ongoing.



CORRUPTION IN THE PROSECUTOR GENERAL'S

In October, NABU and SAPO exposed a large-scale corruption scheme organized by a prosecutor from the Office of the Prosecutor General in conspiracy with two lawyers.

The perpetrators incited a suspect in one of the National Bureau's proceedings to provide a \$3.5 million bribe, which was allegedly intended to bribe SAPO officials and HACC judges to close the case. According to the investigation, the criminal group operated between February and September 2025. During this time, its members developed a detailed plan for the phased transfer of funds, casting themselves in the role of intermediaries. Notably, as the scheme progressed, the bribe amount increased from an initial \$2 million to \$3.5 million. By the time NABU detectives exposed the scheme, the perpetrators had already received a first installment of \$200,000 from the suspect. **All were notified of suspicion under Part 2 of Art. 15, Part 4 of Art. 27, and Part 4 of Art. 369 of the Criminal Code of Ukraine. The investigation is ongoing.**





CORRUPTION IN THE LAND SECTOR

Land resources often fall hostage to private interests, serving as a tool for backroom deals and the legalization of shadow capital.

A prime example of this is the seizure of 18 hectares of land near Kyiv, where the "Stolychnyi" market is located, valued at UAH 160 million. The case began with a conflict between a prominent Kyiv developer and a former Member of Parliament from the infamous "Party of Regions." To gain control over the market, the developer recruited loyal officials from the regional State Land Cadastre, who manipulated the cadastral data. This allowed a massive plot of land to be leased to a controlled company. Subsequently, the head of the leasing firm renounced part of the plots in favor of nine strawmen. These individuals then resold the land through sham agreements to companies linked to the same developer. Ultimately, the parties reached an understanding: the developer and the former MP signed a memorandum on the joint use and development of the land, and the latter's proxy officially joined the ranks of the owners.

In September 2025, NABU detectives exposed the scheme. At the request of SAPO, the land plots were seized, preventing them from being removed from state ownership. The organizers and their accomplices were notified of suspicion.

Another case of land corruption occurred in the Volyn region. The head of a deputy faction in the Volyn Regional Council, a former MP, and the head of the same faction in the Lutsk City Council requested \$30,000 from the user of a land plot in Lutsk (also a former MP). In return, they promised to facilitate the passage of "required" decisions by the Volyn Regional and Lutsk City Councils to permit the construction of an apartment building on the plot. The former MP agreed, and following the approval of the detailed territory plan, provided the deputies with a portion of the bribe—\$15,000. Subsequently, the Volyn Regional Council changed the land use designation, thereby allowing its development. All three individuals received suspicions from NABU and SAPO. The investigation is ongoing.



CORRUPTION IN THE TAX SECTOR

While businesses and citizens conscientiously pay taxes to support the army, certain high-ranking officials have turned public service into a tool for enriching criminal groups.

The scale of the problem is evidenced by the exposure of high-ranking tax officials who facilitated a money-laundering hub with billion-hryvnia turnovers. Its members operated a network of 200 controlled firms that mass-produced fictitious tax invoices. This allowed legitimate enterprises to illicitly reduce their tax liabilities.

Between 2020 and 2023, the hub forged documents for the sale of goods and services totaling UAH 15 billion, with the "scheme-based" VAT exceeding UAH 2.3 billion. The operation was shielded by the former head of the State Tax Service and the deputy head of the Poltava Regional Tax Office. They helped the hub's companies obtain favorable rulings and guaranteed that no tax audits or control measures would be conducted. **According to confirmed data alone, these manipulations resulted in a UAH 147 million tax revenue shortfall for the state budget.** The criminal organization masterfully concealed its activities: documents were stored on foreign servers, and VPNs as well as foreign mobile numbers were used for communication. However, detectives managed to decrypt the "shadow" accounting records, in which the officials kept detailed logs of their illegal profits. To date, 11 participants in the scheme have been notified of suspicion. **The investigation is ongoing.**



CORRUPTION IN THE PORT SECTOR

Ukraine's maritime sector has suffered from corrupt schemes for years.

In the second half of 2025, NABU and SAPO exposed two large-scale embezzlement cases that resulted in tens of millions of hryvnias in lost budget revenue.

At the state enterprise "Chornomorshliah," a scheme was devised to defraud the state twice, totaling over UAH 70 million. First, officials sold the main technical maintenance base in Chornomorsk for a pittance, causing UAH 59 million in damages. The 4.3-hectare facility with sea access was appraised at UAH 6.5 million, though its real value was nine times higher. Ultimately, accomplices purchased the base for UAH 13.5 million. To legalize the property, it was transferred into the authorized capital of a private firm. The UAH 11.5 million that the state enterprise did receive from the sale was subsequently transferred to a shell company for the alleged maintenance of the vessels "Henichesk" and "Khersones." In reality, these ships were docked in India, and no maintenance was ever performed.

Simultaneously, an organized group operated at the Port of Izmail, embezzling over UAH 24 million over two years by purchasing goods at inflated prices. The total amount of damages is significantly higher and is currently being determined. The group members had advance knowledge of tenders and drafted participation terms specifically to filter out legitimate manufacturers. Firms controlled by the scheme's organizer won the contracts and supplied goods at triple the price. The difference was funneled through sole proprietors and distributed as cash among the participants. **Detectives exposed this scheme through an operational investigation initiated after analyzing public procurements in the Prozorro system and reviewing complaints from other bidders.** Several companies involved in the scheme have already been blacklisted by the Anti-Monopoly Committee of Ukraine (AMCU). Active work in this area continues.

ILLICIT ENRICHMENT AND FALSE DECLARATIONS

NABU detectives and SAPO prosecutors systematically expose high-ranking officials who hide expensive purchases from the public and possess funds of unknown origin.

During the reporting period, a former vice prime minister of Ukraine was notified of suspicion of illicit enrichment. Detectives documented the transfer of over \$1.2 million and nearly €100,000 in cash to him and his proxy. Notably, the suspect was among the visitors to the so-called "laundry" used for laundering corrupt funds, which was uncovered by NABU and SAPO during Operation "Midas."

In October, the head of a regional council and his wife, an MP, were notified of suspicion for failing to declare assets worth over UAH 8 million in their 2021–2023 declarations. Furthermore, the couple purchased apartments and two luxury Audi SQ8 vehicles without verified sources of income, totaling nearly UAH 5 million. Based on NABU's findings, a SAPO prosecutor filed a lawsuit to recognize these assets as unjustified and recover them for the state.

The second half of the year also saw the exposure of a Kyiv judge whose assets—a house and land in the Kyiv region—exceeded her legal income by UAH 16 million. Real estate websites listed the properties for nearly \$1 million, with a final purchase price of approximately \$900,000 (roughly UAH 24 million). In her 2021–2024 declarations, the judge understated their value by more than UAH 16 million.

A high-ranking SBU officer was also exposed for illicit enrichment and declaring false information. In December 2023, he purchased an apartment for UAH 21.6 million and registered it in a family member's name. However, according to the contract, the price was only UAH 12.8 million. To justify the source of funds, the family member claimed the income was earned as a sole proprietor providing legal and consulting services since February 2022. Evidence shows that no such services were ever provided. Additionally, there was no confirmation of the legal origin of the remaining UAH 8.8 million used for the apartment purchase.



NABU AND SAPO RESULTS

(as of 31.12.2025)

355 suspects

751 indictments

1555 defendants

301 convictions

408 persons sentenced

NABU AND SAPO RESULTS

(H2 2025)

103 suspects

55 indictments

126 defendants

50 convictions

70 persons sentenced

367 new investigations

EXPOSED FOR CORRUPTION

(H2 2025)

12 - high-ranking state officials

3 - category "A" civil servants and officials of local self-government of the first and second categories

1 - senior officers of the Armed Forces of Ukraine, the Security Service of Ukraine, the State Border Guard Service of Ukraine, the National Guard of Ukraine, or other military formations

6 - heads of state-owned enterprises where the state or communal ownership share exceeds 50%

6 - judges of all levels

16 - civil servants, law enforcement officers, or local government officials who committed corruption offenses resulting in damages to the state exceeding 500 times the subsistence minimum for able-bodied persons

1 - deputies of regional councils or the Kyiv City Council

3 - prosecutors

55 - other individuals and lawyers

BROUGHT TO TRIAL

(H2 2025)

8 - high-ranking state officials

6 - category "A" civil servants and officials of local self-government of the first and second categories

2 - judges of all levels

2 - prosecutors

5 - deputies of regional councils or the Kyiv City Council

22 - civil servants, law enforcement officers, or local government officials who committed corruption offenses resulting in damages to the state exceeding 500 times the subsistence minimum for able-bodied persons

14 - heads of state-owned enterprises where the state or communal ownership share exceeds 50%

67 - other individuals and lawyers

SENTENCED FOR CORRUPTION*

(H2 2025)

CHALLENGES

- 2** - high-ranking state officials
- 2** - category "A" civil servants and officials of local self-government of the first and second categories
- 1** - senior officers of the Armed Forces of Ukraine, the Security Service of Ukraine, the State Border Guard Service of Ukraine, the National Guard of Ukraine, or other military formations
- 5** - heads of state-owned enterprises
- 2** - judges of all levels
- 1** - prosecutors

- 1** - senior officers of law enforcement agencies or oversight services
- 13** - civil servants, law enforcement officers, or local government officials who committed corruption offenses resulting in damages to the state exceeding 500 times the subsistence minimum for able-bodied persons
- 1** - deputies of regional councils or the Kyiv City Council

42 - other individuals and lawyers

**sentences took effect*

4

NABU 2026: HOLDING THE INDEPENDENCE PERIMETER

The key challenge for the National Anti-Corruption Bureau of Ukraine and the entire anti-corruption system in 2026 remains preserving the perimeter of institutional capacity and independence. In practical terms, this means maintaining the ability to act autonomously, professionally, and effectively in the face of ever-increasing external pressure.

First and foremost, attention must be paid to the challenges associated with the Bureau's further scaling. The growth of the organizational structure, the expansion of mandates, and the increased workload are accompanied by risks to preserving institutional identity. Under these conditions, the stability of procedures, internal culture, managerial control, and the ability to ensure performance regardless of the pace of development take on particular importance.

The second set of challenges concerns decisions for which the need has formed not only objectively but also over time. This refers to the establishment of an independent forensic institution and the implementation of the right to autonomous wiretapping. These tools are viewed as critical for increasing the efficiency of investigations and reducing the influence of external factors on the activities of anti-corruption authorities.

A separate dimension of challenges is forming within the sphere of legislative regulation. Existing gaps in the legal field continue to be exploited to evade accountability. Closing these gaps, updating legislation, and further adaptation to European Union standards are essential conditions for strengthening the anti-corruption system. At the same time, this remains a component of Ukraine's international obligations on the path to EU membership.

Maintaining public trust requires special attention. The anti-corruption system was granted a significant mandate of trust, which can only be sustained through consistent, daily, and effective work. A lack of tangible results or a perception of stagnation inevitably impacts this level of trust and must be factored into future management decisions.

It is within this perimeter—of institutional capacity, independence, and responsibility—that NABU enters 2026, understanding that the results of our work in the next reporting period will be evaluated primarily by their quality, resilience, and real impact.

INTERACTION

5

ENGAGEMENT: INDEPENDENCE, RESPONSIBILITY, TRUST

In the second half of 2025, the interaction between the National Anti-Corruption Bureau of Ukraine and international partners, European Union institutions, and civil society remained one of the key factors in maintaining the institutional resilience and independence of the anti-corruption system.

Under conditions of constant external pressure and high public expectations, international support took on not only practical but also strategic significance. Throughout the reporting period, contacts continued with representatives of the European Commission, G7 countries, and partner governments, consistently reaffirming the position that any interference in the activities of anti-corruption bodies is unacceptable and seriously affects Ukraine's European integration.

This position was further reinforced by visits to Ukraine from high-ranking international representatives, including European Commissioner for Neighbourhood and Enlargement Marta Kos and France's Minister Delegate for European Affairs Benjamin Haddad. During meetings with NABU leadership, it was emphasized that the independence of anti-corruption institutions is the foundation of the rule of law, public trust, and international confidence, as well as a key prerequisite for Ukraine's further progress toward European Union membership.

A significant step in developing international cooperation was Ukraine's engagement with the anti-corruption mechanisms of the Organisation for Economic Co-operation and Development (OECD), specifically its participation in the Working Group on Bribery and the invitation to join the OECD Anti-Bribery Convention. This served as recognition of Ukraine's progress in building institutional anti-corruption capacity while defining further obligations to comply with international standards.

A distinct line of engagement involved cooperation with civil society. During the reporting period, NABU signed a memorandum with the "Come Back Alive" Foundation aimed at strengthening integrity and protecting public resources during wartime—an example of consolidating the efforts of a state institution and a reputable public initiative.

It was through this multi-level engagement—both international and public—that NABU ensured the stability of its operations in the second half of 2025, maintaining independence, responsibility, and trust.

COOPERATION WITH GOVERNMENT AGENCIES

(from 01.07.2025 until 31.12.2025)

NABU lawyers analyzed and provided conclusions regarding:

43

DRAFT LAWS

14-Law Enforcement Committee of the Verkhovna Rada of Ukraine

8-Ministry of Justice of Ukraine

4-Interstate Economic Security Bureau of Ukraine

4-Ministry of Veterans Affairs of Ukraine

2-Committee of the Verkhovna Rada of Ukraine on Social Policy and Protection of Veterans' Rights

2-Ministry of Foreign Affairs

1- Cabinet of Ministers of Ukraine

1- Committee of the Verkhovna Rada of Ukraine on Anti-Corruption Policy

1- National Agency of Ukraine for Civil Service

1- Ministry of Digital Transformation of Ukraine

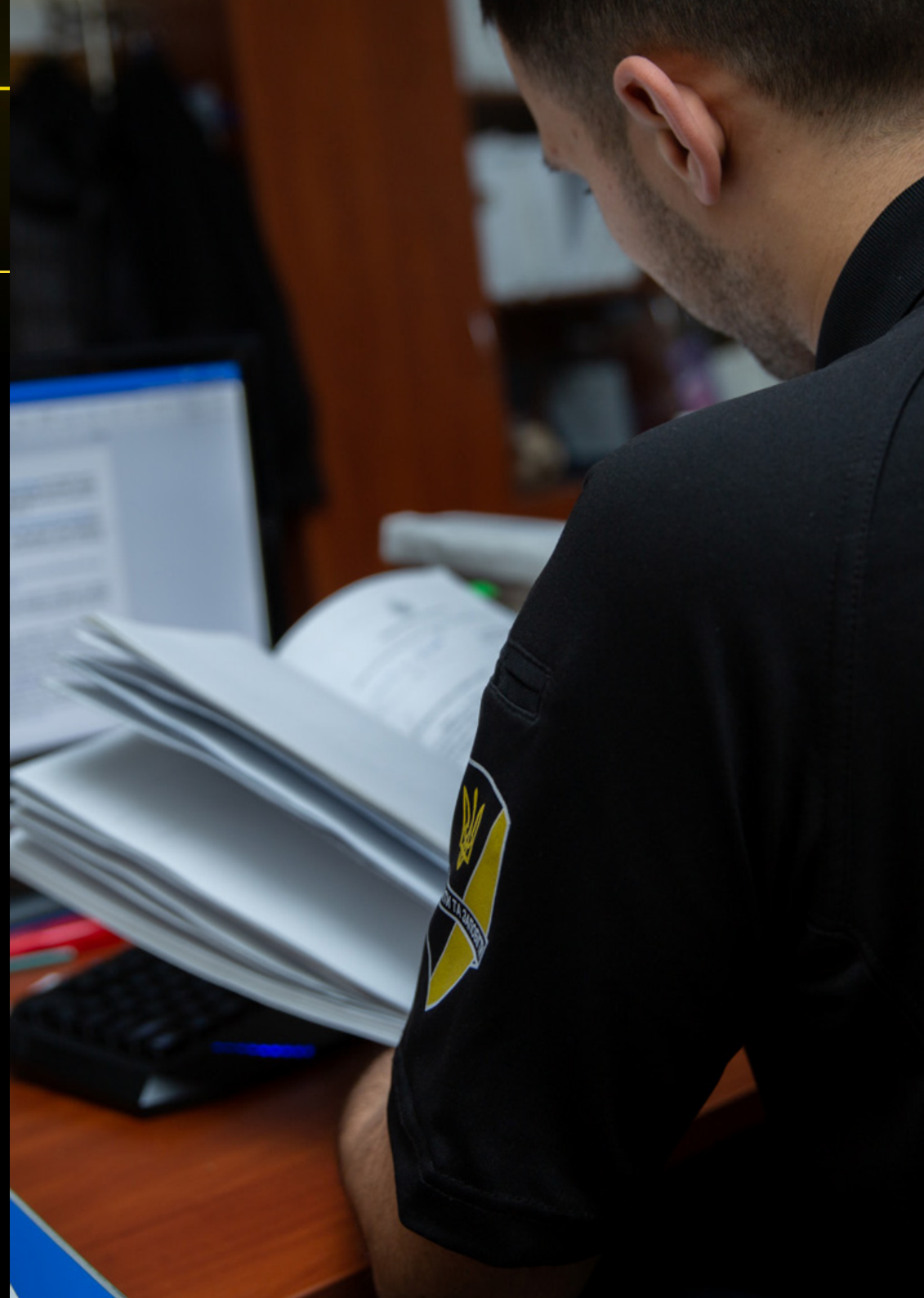
1- Ministry of Internal Affairs of Ukraine

1- Committee of the Verkhovna Rada of Ukraine on Legal Policy

1- Office of the Prosecutor General

1- State Audit Service

1- National Agency on Corruption Prevention



COOPERATION WITH GOVERNMENT AGENCIES

(from 01.07.2025 until 31.12.2025)

NABU lawyers analyzed and provided conclusions regarding:

66

DRAFTS OF SUBORDINATE ACT

9-Ministry of Defence of Ukraine

6-Ministry of Foreign Affairs of Ukraine

5-Ministry of Veterans Affairs of Ukraine

5-Ministry of Health of Ukraine

4-Ministry of Internal Affairs of Ukraine

3-Cabinet of Ministers of Ukraine

3-National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes

3-National Agency of Ukraine for Civil Service

3-State Audit Service of Ukraine

3-National Agency on Corruption Prevention

2-Ministry of Justice of Ukraine

2-Ministry of Economy of Ukraine

2-Ministry of Social Policy, Family and Unity of Ukraine

2-Ministry for Communities and Territories Development of Ukraine

2-Ministry of Youth and Sports

2-Ministry of Education and Science

1-Administration of the State Border Guard Service of Ukraine

1-State Archival Service of Ukraine

1-State Bureau of Investigation

1-Ministry of Finance of Ukraine

1-Security Service of Ukraine

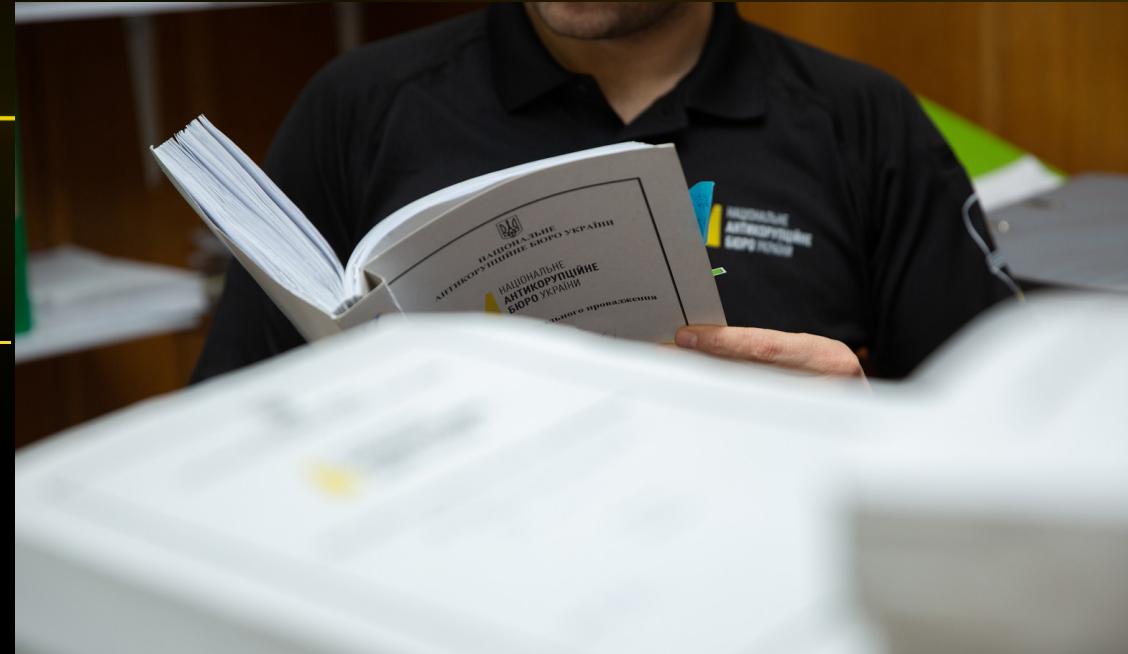
1-State Emergency Service of Ukraine

1-Pension Fund of Ukraine

1-Office of the Prosecutor General

1-Administration of the State Special Communications Service

1-Economic Security Bureau of Ukraine



COMMUNICATION WITH THE PUBLIC

Public activity

[from 01.07.2025 until 31.12.2025]

142 responses to media requests

97 comments to media on NABU's work

27 interviews for the national media

44 briefings and press conferences (incl. online)

52 awareness raising events (incl. online)

3468 number of attendees



COMMUNICATION WITH THE PUBLIC

Requests to the National bureau

(from 01.07.2025 until 31.12.2025)

11 278

APPENDICES

6285 by mail/email

218 via the public office

3402 via the call center

263 from legal entities and authorities

760 from NGOs

350 public information requests

6

Scan the QR code for appendices that contain statistical information on the NABU and SAPO work in the second half of 2025



National bureau
in social networks



Contact the National bureau

info@nabu.gov.ua
(on general issues)

special phone line:
0-800-213-200

press@nabu.gov.ua
press.nabu@gmail.com
(for mass media)



HOLDING THE INDEPENDENCE PERIMETER